

E. Lynn Schoenmann, Trustee
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:)	
)	
PETER R. FADER)	
<i>dba Urchin Capital Partners</i>)	
<i>dba Urchin Partners LLC,</i>)	Case No. 08-30119-DM
)	
Debtor.)	
)	Chapter 7
)	
)	

TRUSTEE'S FINAL REPORT AND APPLICATION FOR
COMPENSATION

E. Lynn Schoenmann, Trustee and Applicant herein ("Applicant" or "Trustee"), hereby submits her *Final Report and Application for Compensation*.

On January 26, 2008, Peter R. Fader ("Debtor") filed a voluntary chapter 7 bankruptcy petition. The Debtor received a discharge and the case was closed in 2010.

On July 14, 2019, the Debtor filed an application to reopen the case to disclose claims that were omitted from his schedules and to enable a trustee to determine whether the claims were property of the estate and if so to liquidate the claims for the benefit of creditors and,

possibly, in part for the benefit of the Debtor. The claims arose from Steven R. Boal's ("Boal") promises to pay the Debtor for raising capital for two of Boal's companies: Quotient Technology, Inc. ("Quotient") and CashStar, Inc. ("CashStar"). The Debtor claimed that based on those promises, he raised millions of dollars for Quotient and CashStar, but when he requested payment pursuant to the oral promises made by Boal, Boal refused to pay him.

On September 13, 2019, the Debtor's bankruptcy case was reopened and Applicant was appointed Trustee.

The case presented unique and significant challenges. The claims against Boal, which were the only asset of the estate, were based on decades old oral agreements. Debtor's credibility and veracity were challenged by Boal. But despite these challenges, after nearly two years of litigation, Applicant and her professionals were able to achieve and obtain Court approval of a settlement which will result in a meaningful distribution to creditors.

At the outset, Applicant, with court approval, retained general bankruptcy counsel for the estate, as well as special litigation counsel (the Meade Firm P.C. and Dontzin Nagy & Fleissig LLP) to prosecute the claims on a contingency fee basis.

The Debtor contended that he had rights to the claims because they arose, in part, post-petition. To resolve the dispute over the ownership of the claims, Applicant and the Debtor negotiated and ultimately entered into a Litigation Recovery Sharing Agreement ("Sharing Agreement") which provided the Debtor with 40% of the net proceeds recovered from Applicant's prosecution of the Claims and 60% to the estate, after payment of all allowed chapter 7 administrative expenses and allowed domestic support obligations. On February 6, 2020, the Court approved the Sharing Agreement.

Applicant's investigation of the claims revealed that they were colorable. On December 9, 2019 a complaint was filed in the Santa Clara County Superior Court against Boal and Quotient alleging claims for breach of oral contracts, breach of fiduciary duties, and for imposition of a constructive trust, declaratory relief, and an accounting. Boal removed the complaint to the United States District Court for the Northern District of California and the case was referred to the Bankruptcy Court.

In August 2022 the parties participated in a mediation and agreed to settle, subject to Bankruptcy Court approval. The settlement was memorialized in a Settlement Agreement and Release (the "Settlement Agreement") pursuant to which Boal and Quotient agreed to pay the estate the sum of \$5,000,000 payable in two equal installments of \$2,500,000 in consideration for a full release. The releases become effective 91 days after the Trustee received the last payment, due in March 2023. The Trustee retained the right to rescind the Settlement Agreement if either Quotient or Boal filed an insolvency proceeding at any time after entry of a final order approving the Settlement Agreement and 91 days from the last payment. If the Trustee decided to rescind the Settlement Agreement, all disbursements from the settlement were to be returned to the Trustee, including any professional fees paid.

On November 10, 2022, the Court issued a memorandum decision approving the Settlement Agreement (and related motions) and overruled the objection to the Settlement Agreement that had been filed by a creditor. On November 16, 2022 the Court entered an order approving the Settlement Agreement.

Applicant received the first installment of \$2,500,000 in two wire transfers received on December 15 and December 16, 2022. Applicant received the final installments in two wire

transfers received on March 15 and March 20, 2023.

The administration of the estate is now complete. Applicant has received the full settlement amount as required by the Settlement Agreement and has reconciled all general unsecured claims and filed and resolved objections where necessary.

As set forth in the Trustee's Final Report filed herewith, Applicant will pay all administrative and priority claims in full (including 100% of allowed domestic support obligations). The dividend to general unsecured creditors is anticipated to be 24%. In addition, the Debtor will receive \$541,135 pursuant to the Sharing Agreement.

This is Applicant's Final Report. Applicant previously submitted her First Interim Report and Application for Compensation dated January 7, 2023. Pursuant to an order entered on February 9, 2023, Applicant has been paid \$98,250 in interim compensation.

Applicant's time records are attached hereto. Applicant represents that she has devoted approximately 197.60 hours to the administration of this estate to date.

Applicant's final compensation payable pursuant to Bankruptcy Code section 326 is calculated as follows:

Total Disbursements:	\$5,000,000
Less: Disbursements to the Debtor:	<u>541,135</u>
Total Compensable Disbursements:	\$4,458,865
25% of the first \$5,000	(\$1,250.00);
10% of the next \$45,000	(\$4,500.00);
5% of the next \$950,000	(\$47,500.00);
3% of amounts in excess of \$1,000,000	(\$103,765.95);

for total maximum compensation of \$157,015.95. Applicant submits that this amount is presumptively reasonable compensation under the facts and circumstances of this case (*In re Salgado-Nava* 473 B.R. 911 (BAP 9th Cir. 2012)). Applicant has previously been paid \$98,250 for a remaining balance of \$58,765.95 in allowable compensation. Applicant is hereby requesting approval of an additional \$58,500 as final compensation.

Respectfully submitted,

/s/E. Lynn Schoenmann
E. Lynn Schoenmann, Trustee

Dated: February 20, 2024

COMPENSATION WORKSHEET

Case Number: 08-30119 DM
Debtor: FADER, PETER R

Total disbursements are: \$5,000,000.00

Less: Disbursements to the Debtor	<u>541,135.00</u>
Compensable Disbursements	\$4,458,865.00

Pursuant to 11 U.S.C. Section 326, compensation is computed as follows:

25% of First \$5,000.00	1,250.00
10% of Next \$45,000.00	4,500.00
5% of Next \$950,000.00	47,500.00
3% of Balance	<u>103,765.95</u>
TOTAL COMPENSATION ALLOWED	157,015.95
LESS PREVIOUSLY PAID COMPENSATION	<u>98,250.00</u>
FINAL COMPENSATION ALLOWED	58,765.95
FINAL COMPENSATION REQUESTED	\$58,500.00

February 18, 2024

Professional Services

		<u>Hrs/Rate</u>
9/13/2019	ELS Administration, General Phone con Mr. Brown re case; review docket, claims register, pleadings re re-opening of case; prepare internal memo re case set-up; email to Mr. Crom; review petition, schedules; review AP docket, pleadings, decision re objection to discharge	1.50
9/17/2019	ELS Administration, General email from Mr. Brown re employment	0.10
9/18/2019	ELS Administration, General Receive, review, approve and execute application for employment of counsel	0.20
	ELS Administration, General email from Mr. Levinson re litigation counsel	0.20
	ELS Administration, General emails from/to Mr. Brown re litigation counsel	0.30
9/20/2019	ELS Administration, General emails from/to Mr. Brown, Mr. Levinson re meeting with litigation counsel	0.40
9/23/2019	ELS Administration, General Receive, review, execute various documents	0.10
9/25/2019	ELS Administration, General email from Mr. Brown re meeting with litigation counsel	0.10
9/26/2019	ELS Administration, General Meeting with Mr. Brown re prospective litigation; meeting with prospective litigation counsel	2.50

		<u>Hrs/Rate</u>
9/26/2019	ELS Administration, General emails to/from Mr. Brown re Mr. Levinson continued representation of debtor	0.20
9/27/2019	ELS Claims Admin emails to/from Mr. Brown re claims review	0.20
9/29/2019	ELS Claims Admin Review of claims scheduled re measure of value of discharge	0.30
9/30/2019	ELS Administration, General Discussions Mr. Brown re litigation strategy, structuring agreement with debtor, claims	0.50
10/2/2019	ELS Administration, General email from Mr. Brown re Mr. Levinson representation of debtor	0.10
	ELS Administration, General emails to/from Mr. Brown re special counsel contingency fee	0.10
10/3/2019	ELS Administration, General email from Mr. Brown re DNF retainer changes	0.10
10/4/2019	ELS Administration, General Review proposed terms of representation special litigation counsel; discussions Mr. Brown re same; conference call with proposed counsel; review drafts of revised representation terms	1.50
	ELS Administration, General emails to/from Mr.. Brown, Mr. Meade, Mr. Nagy re terms of retention agreement, set up conference call	1.60
10/7/2019	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re changes to retention agreement, employment applications	0.40
10/8/2019	ELS Administration, General email from Mr. Brown re Orrick representation of debtor	0.10
10/10/2019	ELS Administration, General Receive, review proposed terms of retention litigation counsel. Discussions Mr. Brown re same.	0.60
10/17/2019	ELS Administration, General Review draft of conflict waiver Fader/Meade	0.30
	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re conflict waiver	0.50

		<u>Hrs/Rate</u>
10/21/2019	ELS Administration, General email from Mr. Meade re status of conflict waiver	0.10
10/22/2019	ELS Administration, General emails from/to Mr. Brown, Mr. Meade with changes to conflict waiver, review same, approve	0.30
10/23/2019	ELS Administration, General email from Mr. Brown re debtor conflict waiver	0.10
10/24/2019	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re employment apps special litigation counsel, review same	0.30
	ELS Administration, General email from Mr. Brown re meeting with Mr. Levinson	0.10
10/25/2019	ELS Administration, General email from Mr. Brown re revised employment apps, review	0.20
10/26/2019	ELS Administration, General emails to/from Mr. Brown re meeting with Mr. Levinson	0.20
10/30/2019	ELS Administration, General email from Mr. Brown re finalizing employment apps and declaration	0.10
10/31/2019	ELS Administration, General email from Mr. Nagy re final employment app	0.10
11/1/2019	ELS Administration, General emails from Mr. Brown, Mr. Levinson re meeting	0.20
	ELS Administration, General emails from Mr. Brown, Mr. Meade re employment apps	0.20
11/3/2019	ELS Administration, General email from Ms. Manning re employment apps	0.10
11/5/2019	ELS Administration, General email from Ms. Manning re employment apps	0.10
	ELS Administration, General email from Mr. Brown re retention agreements	0.10
11/6/2019	ELS Administration, General Review, execute retention agreements special litigation counsel	0.20
11/7/2019	ELS Administration, General email from Mr. Brown re retention agreements	0.10

			<u>Hrs/Rate</u>
11/11/2019	ELS	Administration, General Meeting Mr. Brown, Mr. Brown and Mr. Levinson re litigation, terms of agreement	1.50
	ELS	Administration, General emails from/to Mr. Brown re meeting with Mr. Levinson; arrange conference call with Mr. Meade	0.30
11/12/2019	ELS	Administration, General Conference call Mr. Brown, Mr. Meade re litigation; review of claims register; discussion Mr. Brown re duty to debtor, residual assets	1.00
	ELS	Administration, General email from Mr. Brown re analysis of trustee duties debtor, estate, creditors	0.10
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re timing of filing of lawsuit; negotiations re split with debtor	0.20
11/13/2019	ELS	Administration, General emails to/from Mr. Brown re negotiations with debtor	0.20
	ELS	Administration, General Receive, review order of appointment special litigation counsel	0.10
11/15/2019	ELS	Administration, General email from Mr. Meade with supporting declaration	0.10
11/20/2019	ELS	Administration, General email from Mr. Brown with draft litigation sharing agreement	0.10
	ELS	Administration, General email from Mr. Brown re negotiations with debtor	0.10
11/21/2019	ELS	Administration, General email from Mr. Levinson re negotiations with debtor	0.10
	ELS	Administration, General email from Mr. Brown re proceeding without litigation sharing agreement	0.10
11/27/2019	ELS	Administration, General email from Mr. Meade with draft complaint	0.10
12/2/2019	ELS	Administration, General email from Mr. Brown with complaint edits	0.10
	ELS	Administration, General email from Mr. Meade re complaint	0.10

		<u>Hrs/Rate</u>
12/3/2019	ELS Administration, General email from/to Mr. Brown re progress re sharing deal with debtor	0.10
12/9/2019	ELS Administration, General Review final draft of complain; approve for filing	0.30
	ELS Administration, General emails to/from Mr. Meade re complaint, status negotiations with debtor	0.40
12/12/2019	ELS Administration, General emails from/to Mr. Brown re sharing negotiations, draft agreement	0.30
12/14/2019	ELS Claims Admin Review of claims register	0.20
12/17/2019	ELS Administration, General emails from/to Mr. Brown re Boal claim filed	0.20
12/18/2019	ELS Administration, General emails from/to Mr. Brown with draft revenue sharing agreement	0.10
	ELS Administration, General email from Mr. Brown with revised declaration	0.10
12/19/2019	ELS Administration, General Discussion Mr. Brown re debtor involvement	0.10
	ELS Administration, General Conference call Mr. Brown, Mr. Meade re state court action	0.30
	ELS Administration, General email from Mr. Meade with edits to revenue sharing agreement	0.10
	ELS Administration, General email from Mr. Meade re declaration	0.10
	ELS Administration, General email from Mr. Meade re judge assignment	0.10
	ELS Administration, General email from Mr. Meade re peremptory challenge to judge	0.10
	ELS Administration, General emails to/from Mr. Meade, Mr. Brown re peremptory challenge to judge	0.30
12/20/2019	ELS Claims Admin emails to/from Mr. Brown, Ms. Manning re claims	0.20

		<u>Hrs/Rate</u>
12/27/2019	ELS Administration, General emails to/from Mr. Brown re sharing agreement	0.30
12/28/2019	ELS Administration, General Review proposed sharing agreement; emails to/from Mr. Brown with comments	0.50
12/30/2019	ELS Administration, General Review claims register, case status generally	0.30
12/31/2019	ELS Administration, General Receive executed sharing agreement; review, execute same, forward to counsel	0.30
1/8/2020	ELS Administration, General email from Mr. Brown, Mr. Meade re dec, status, call	0.10
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re removal papers	0.20
1/13/2020	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re removal research	0.30
1/14/2020	ELS Administration, General email from Mr. Meade re removal research	0.10
	ELS Administration, General emails from/to Mr. Brown, ,Mr. Meade re hearing on revenue sharing agreement	0.20
1/17/2020	ELS Administration, General emails to/from Mr. Brown, Mr. Meade re certification of interested parties	0.50
1/24/2020	ELS Administration, General emails to/from Ms. Manning, Mr. Levinson, Mr. Brown, Mr. Meade re Boal objection to revenue sharing agreement	0.30
1/25/2020	ELS Administration, General emails to/from Mr. Brown, Mr. Meade re Boal objection to revenue sharing agreement	0.20
1/27/2020	ELS Administration, General Phone con counsel re objection to sharing agreement	0.20
1/31/2020	ELS Administration, General email from Mr. Brown re results of hearing on revenue sharing agreement	0.10

			<u>Hrs/Rate</u>
2/6/2020	ELS	Administration, General Phone con Mr. Brown re sharing agreement, status, removal/remand state court	0.30
	ELS	Administration, General email from Mr. Brown with order approving revenue sharing agreement	0.10
2/12/2020	ELS	Administration, General Phone con Mr. Brown re status	0.20
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re order extending time to object to motion to dismiss reference to bankruptcy court	0.20
2/23/2020	ELS	Administration, General email from Mr. Brown re Boal attorney communications	0.10
2/26/2020	ELS	Administration, General emails from/to Mr. Brown re Rule 9027 removal, jury trial demand	0.20
4/10/2020	ELS	Administration, General emails to/from Mr. Meade, Mr. Brown re status, projections for UST	0.30
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re letter to court re status conference	0.30
4/17/2020	ELS	Administration, General email from Mr. Brown with court memorandum re withdrawal of reference	0.10
5/23/2020	ELS	Administration, General Review docket re status of removal	0.10
6/11/2020	ELS	Administration, General Receive, review order denying motion to withdraw the reference; emails to/from counsel re same	0.20
	ELS	Administration, General email from Mr. Meade, Mr. Brown re order denying motion to withdraw the reference	0.10
7/23/2020	ELS	Administration, General Phone con Mr. Brown re status; question of representation of deponents	0.40
8/3/2020	ELS	Administration, General Phone con Mr. Brown re status	0.20

		<u>Hrs/Rate</u>
8/6/2020	ELS Administration, General Review docket, scheduling, draft opposition to motion to dismiss, edits, final version. email to Mr. Brown with comments.	1.20
	ELS Administration, General email from Mr. Brown re draft opposition to motion to dismiss, review same	0.30
8/27/2020	ELS Administration, General Review reply brief re motion to dismiss	0.50
9/4/2020	ELS Administration, General email from Mr. Meade re hearing on motion to dismiss	0.10
9/15/2020	ELS Administration, General emails from/to Mr. Brown re Boal withdrawal of claim	0.40
9/16/2020	ELS Administration, General Discussion Mr. Brown re notice of intent to withdraw claims	0.20
	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re Boal withdrawal of claim with memo of issues presented	0.50
9/17/2020	ELS Administration, General Discussion with counsel re defendant withdrawal of claims, response thereto, litigation strategy	0.60
	ELS Administration, General emails from/to Mr. Nagy, Mr. Brown re Boal claim withdrawal, with claims	0.40
9/28/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Nagy, Mr. Meade re response to Boal intent to withdraw claim, draft response	0.40
9/29/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re draft response, finalize and send	0.50
10/30/2020	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re memo decision on motion to dismiss	0.10
11/1/2020	ELS Administration, General emails to/from Mr. Brown re memo decision on motion to dismiss	0.10
11/2/2020	ELS Administration, General emails to/from Mr. Brown re memo decision on motion to dismiss	0.10

		<u>Hrs/Rate</u>
11/8/2020	ELS Administration, General Review opinion motions to dismiss	0.40
11/10/2020	ELS Administration, General Phone con Mr. Meade re status	0.20
11/17/2020	ELS Administration, General Conference call Mr. Meade, Mr. Brown re status; conference call Friday, depositions, subpoena to Quotient, 6 depositions to be noticed; on track to have depositions done by 1st quarter 21; settlement possibilities; anticipated timeline generally.	0.20
11/19/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re Boal motion to withdraw claims	0.20
11/21/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re response to Boal motion to withdraw claims	0.10
11/23/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Nagy, Mr. Meade re response to Boal motion to withdraw claims	0.10
11/24/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Nagy, Mr. Meade re response to Boal motion to withdraw claims	0.30
11/29/2020	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re Boal motion to withdraw claims, set up call	0.20
12/1/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re stipulation re Boal withdrawal of claims	0.20
12/2/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re stipulation re claims withdrawal	0.20
12/4/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re stipulation re withdrawal of claims	0.20
12/8/2020	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy, Ms. Manning re issues with stipulation re withdrawal of claims	1.40

		<u>Hrs/Rate</u>
12/11/2020	ELS Administration, General Receive, review CMC statement, discovery plan; emails to/from counsel re deposition	0.60
12/13/2020	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Ms. Manning, Mr. Nagy re CMC statement and discovery plan	0.30
12/16/2020	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re draft responses to written discovery	0.30
12/18/2020	ELS Administration, General Conference call with counsel re status	0.50
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re draft discovery responses.	0.70
	ELS Administration, General email from Mr. Meade re status conference	0.10
12/21/2020	ELS Administration, General Attention to discovery; review interrogatories, requests for production of documents; review, execute verifications, forward to counsel	0.80
1/12/2021	ELS Administration, General Work on year-end reporting	0.50
1/19/2021	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Mr. Nagy re status	0.60
1/21/2021	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Mr. Nagy re scheduling	0.10
1/25/2021	ELS Administration, General emails to/from Mr. Brown rediscovery issues	0.30
1/27/2021	ELS Administration, General Conference call with counsel; review of status, witnesses, discovery, scheduling of depositions. Anticipated timeline.	0.70
1/28/2021	ELS Administration, General emails to/from Mr. Brown, Ms. Wirum re discovery issues	0.30
1/31/2021	ELS Administration, General TIR preparation	0.50
2/3/2021	ELS Administration, General emails from/to Mr. Meade re ADR certification	0.10

			<u>Hrs/Rate</u>
5/6/2021	ELS	Administration, General Phone con Mr. Brown re discovery response; phone con Mr. Lowenstein re same	0.40
	ELS	Administration, General emails from/to Mr. Lowenstein, Mr. Brown re document discovery search issues	0.20
6/30/2021	ELS	Administration, General emails from/to Mr. Brown, Mr. Meade re discovery declaration	0.60
7/9/2021	ELS	Administration, General Conference call among counsel re litigation discovery issues	0.80
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re discovery declaration	0.20
	ELS	Administration, General email from Mr. Nagy re debtor substitution of counsel	0.10
	ELS	Administration, General emails from/to Mr. Nagy, Mr. Brown, Mr. Meade re new issues	0.40
7/10/2021	ELS	Administration, General emails to/from Mr. Brown, Mr. Nagy, Mr. Meade re further discovery issues	0.20
7/12/2021	ELS	Administration, General Conference call with counsel re discovery issues, counsel for Debtor	0.80
	ELS	Administration, General Phone con Mr. Kieve re possible representation of debtor	0.30
7/13/2021	ELS	Administration, General emails from/to counsel re Fader counsel	0.30
7/17/2021	ELS	Administration, General emails to/from Mr. Kieve, Mr. Brown re Fader representation, conference call	0.10
7/19/2021	ELS	Administration, General Conference call Mr. Kieve, Mr. Brown; review of claims register	0.80
	ELS	Administration, General emails to/from Mr. Kieve, Mr. Brown re debtor counsel	0.10
	ELS	Administration, General emails from/to Mr. Brown re Boal withdrawal of claims	0.10
	ELS	Administration, General emails to/from Mr. Kieve, Mr. Brown re due diligence re representation of debtor, forward claims register, revenue sharing	0.70

		<u>Hrs/Rate</u>
	agreement	
7/19/2021	ELS Administration, General emails to/from Mr. Kieve, Mr. Brown re waterfall; distribution per revenue sharing agreement	0.80
7/21/2021	ELS Administration, General Phone con Mr. Brown re Kieve representation of debtor	0.30
7/22/2021	ELS Administration, General Phone con Mr. Kieve re possibility of retention as counsel to Debtor; discovery issues; phone con Mr. Brown re same	0.80
7/23/2021	ELS Administration, General email from Mr. Meade re availability	0.10
7/26/2021	ELS Administration, General emails from/to counsel re scheduling of conference call	0.10
7/27/2021	ELS Administration, General Conference call with counsel re discovery issues	0.40
	ELS Administration, General emails from Mr. Kieve re debtor retention	0.20
	ELS Administration, General emails from/to Mr. Kieve, Mr. Brown, Mr. Meade re logistics of assuming representation of debtor, document sharing, common interest privilege	1.00
8/18/2021	ELS Administration, General email from Mr. Meade re unavailability	0.10
9/15/2021	ELS Administration, General Review of interrogatory responses, docket, respond to counsel	0.40
	ELS Administration, General email from counsel re interrogatories	0.10
9/16/2021	ELS Administration, General emails from counsel with current draft responses to interrogatories	0.50
9/18/2021	ELS Administration, General Phone con Mr. Kieve re privilege ruling	0.20
9/19/2021	ELS Administration, General Discussions Mr. Kieve, Mr. Brown re order of privilege log dispute; review same	0.30

		<u>Hrs/Rate</u>
9/19/2021	ELS Administration, General email from Mr. Meade re order on privilege log	0.10
9/22/2021	ELS Administration, General Phone con Mr. Meade re recent decision re privilege log; discussion re pleading protocol going forward	0.40
12/4/2021	ELS Administration, General email from Mr. Brown re debtor response	0.10
12/17/2021	ELS Claims Admin Phone con Mr. Larson, creditor, re possibility of late filed claim; forward claim form with instructions	0.30
1/19/2022	ELS Administration, General email from Mr. Brown re status report	0.10
1/20/2022	ELS Administration, General email from Mr. Meade re status report	0.10
1/24/2022	ELS Administration, General email from Mr. Meade re status report	0.10
1/25/2022	ELS Administration, General Work on UST TIR; receive, review summary provided by special litigation counsel. Update for UST.	0.50
2/3/2022	ELS Administration, General emails to/from counsel re status of interrogatories	0.10
2/4/2022	ELS Administration, General Review supplemental interrogatories, calls to Mr. Forouzan re same; approve, execute verification	0.30
2/7/2022	ELS Claims Admin Receive, review Larson proof of claim; return with instructions to file with court	0.30
3/16/2022	ELS Administration, General emails to/from Mr. Meade re status update, review	0.20
	ELS Administration, General email from Mr. Brown re debtor deposition	0.10
3/25/2022	ELS Administration, General Review updated case schedule	0.20
	ELS Administration, General email from counsel re case schedule	0.10

		<u>Hrs/Rate</u>
3/31/2022	ELS Administration, General emails from/to counsel re Quotient update	0.40
5/20/2022	ELS Administration, General email from Mr. Brown re debtor deposition	0.10
	ELS Administration, General email from Mr. Kieve re debtor deposition	0.10
5/25/2022	ELS Administration, General emails from/to counsel re depositions	0.20
5/26/2022	ELS Administration, General emails from/to counsel re possible settlement discussions	0.20
5/27/2022	ELS Administration, General Conference call with counsel re depositions; status; settlement possibilities	1.30
6/1/2022	ELS Administration, General Discussion Mr. Brown, Mr. Meade re settlement negotiations	0.30
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re response to settlement proposal with draft response	0.70
6/2/2022	ELS Administration, General Phone con Mr. Brown re status of settlement, interaction with debtor	0.30
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re Fader input, waterfall	0.20
6/3/2022	ELS Administration, General emails from/to Kr. Kieve, Mr. Brown, Mr. Meade re debtor input, waterfall, demand	0.30
6/6/2022	ELS Administration, General Conference call with counsel re settlement negotiations	0.30
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Mr. Kieve, Mr. Nagy re defendant response	0.40
6/9/2022	ELS Administration, General Conference call with counsel re mediation, ongoing settlement discussions	0.40
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Mr. Nagy re conversations with opposing counsel	0.30

		<u>Hrs/Rate</u>
6/14/2022	ELS Administration, General emails from/to Mr. Meade re mediator	0.10
6/17/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.20
6/18/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.20
6/29/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.30
7/1/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.20
7/7/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.20
7/8/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.20
7/12/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re mediator	0.40
7/22/2022	ELS Administration, General email from Mr. Nagy re Quotient deposition subpoena	0.10
7/25/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re deposition subpoenas	0.30
7/27/2022	ELS Administration, General Discussions Mr. Meade re mediation	0.30
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re deposition subpoenas	0.40
8/4/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re mediation logistics	0.20
8/11/2022	ELS Administration, General Review draft of mediation brief	0.50
	ELS Administration, General Conference call re mediation statement, planning; further review mediation brief	0.80
8/16/2022	ELS Administration, General Work on mediation prep; review drafts of mediation statement; review of claims register; discussions Mr. Brown	2.50

			<u>Hrs/Rate</u>
8/17/2022	ELS	Administration, General Phone cons Mr. Brown re mediation strategy; edits to mediation statement; review draft of email to mediator	0.80
8/23/2022	ELS	Administration, General Conference call with counsel re mediation prep	0.50
8/24/2022	ELS	Administration, General JAMS mediation	9.50
8/25/2022	ELS	Administration, General emails from/to Mr. Brown, Mr. Nagy, Mr. Meade re mediator's proposal, acceptance	0.60
	ELS	Administration, General emails from/to Mr. Brown, Mr. Meade re Fader communications	0.20
8/31/2022	ELS	Administration, General emails from/to Mr. Brown re Boal response to mediator's proposal	0.20
9/1/2022	ELS	Administration, General emails to/from Mr. Brown, Mr. Meade, Ms. Manning re settlement, confirm agreement @ \$5m; fee apps; draft settlement agreement	1.90
9/2/2022	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown, Ms. Manning with settlement agreement drafts and comments; call with Mr. Kieve; waterfalls	0.80
9/3/2022	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown, Ms. Manning re revisions to settlement agreement	0.20
9/5/2022	ELS	Administration, General emails from/to Mr. Brown, Mr. Crom, Ms. Manning re characterization of settlement for tax purposes, commission issues, edits to language of agreement	0.70
9/6/2022	ELS	Administration, General emails to/from Mr. Meade re possible deposit at signing	0.10
	ELS	Administration, General emails from/to Mr. Brown, Mr. Crom re taxes due at settlement	0.20
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re signatories	0.10
9/7/2022	ELS	Administration, General email from Mr. Meade re signatories	0.10

			<u>Hrs/Rate</u>
9/9/2022	ELS	Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Crom re waterfall, taxes, claims clean up	0.60
9/10/2022	ELS	Administration, General email from/to Mr. Brown re waterfall	0.10
9/12/2022	ELS	Administration, General Phone con with counsel re settlement agreement, analysis of waterfall	0.40
	ELS	Administration, General emails to/from Mr. Meade, Mr. Brown, Mr. Crom, Ms. Manning re updated waterfalls, fees	0.70
9/13/2022	ELS	Administration, General emails to/from counsel re draft waterfall	0.30
9/14/2022	ELS	Administration, General emails to/from Mr. Brown re edits to draft email re updated waterfall	0.10
	ELS	Claims Admin emails to/from Ms. Manning re claims	0.30
9/15/2022	ELS	Administration, General Review correspondence, phone con with Mr. Meade, re issues with remittance of settlement	0.50
	ELS	Administration, General emails to/from Mr. Meade, Mr. Crom, Mr. Brownk re settlement issues re payments, timing	0.20
	ELS	Claims Admin emails to/from Ms. Manning re claims	0.10
9/16/2022	ELS	Administration, General Discussions with counsel re Quotient request for deferral of settlement payment, counter proposal	0.40
	ELS	Claims Admin email from Ms. Manning re status of claim #6	0.10
9/20/2022	ELS	Administration, General Review proposals re settlement payment; conference call with counsel re same	0.40
	ELS	Administration, General emails from/to Mr. Meade, Mr. Crom, Mr. Brown re settlement payments	0.50

		<u>Hrs/Rate</u>
9/21/2022	ELS Administration, General emails to/from Mr. Meade, Mr. Brown, Ms. Manning re settlement payments, timing, tax implications	0.70
	ELS Claims Admin emails from Ms. Manning re claim #6	0.10
9/22/2022	ELS Administration, General emails to/from Mr. Brown, Mr. Meade, Mr. Crom re edits to settlement agreement, timing of payments, priority of payments	0.80
9/23/2022	ELS Administration, General emails to/from Mr. Meade, Mr. Crom, Mr. Brown with further edits to settlement agreement	0.90
9/24/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Crom re updated waterfall, sharing with debtor	0.20
9/26/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re waterfall, Clooback order for tax payments	0.30
9/27/2022	ELS Administration, General email from Ms. Manning with draft motion for Clooback order	0.10
	ELS Administration, General emails from/to Mr. Meade re debtor request of copy of draft settlement agreement	0.20
9/28/2022	ELS Administration, General email from Ms. Manning re hearing on settlement	0.10
10/6/2022	ELS Administration, General Conference call with counsel re settlement	0.40
	ELS Administration, General emails to/from Mr. Meade, Mr. Brown, Mr. Nagy re strategy re settlement rescission language	0.70
10/7/2022	ELS Administration, General email from Mr. Meade re rescission language	0.10
10/8/2022	ELS Administration, General email from Mr. Brown re rescission language, confidentiality issue	0.10
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown, Ms. Manning re settlement agreement management issues, W-9	0.50

		<u>Hrs/Rate</u>
10/9/2022	ELS Administration, General email from Mr. Brown re problems with confidentiality	0.10
10/10/2022	ELS Administration, General Conference call with counsel re settlement	0.50
	ELS Administration, General Phone con Mr. Meade re settlement	0.10
	ELS Administration, General emails from Mr. Meade, Ms. Manning with redline of draft settlement agreement	0.20
10/11/2022	ELS Administration, General emails from/to Mr. Meade, court, Ms. Manning re scheduling hearing	0.30
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re edits to agreement, liability issues	0.20
10/12/2022	ELS Administration, General Conference call with counsel re settlement	0.40
	ELS Administration, General Conference call with counsel re settlement terms	0.80
	ELS Administration, General emails from/to Mr. Meade, Mr. Brown with edits to draft agreement, joint and several liability issues, Boal/Quotient split	0.90
	ELS Administration, General emails from/to Mr. Brown, Ms. Manning re declaration	0.20
	ELS Administration, General emails from/to Mr. Meade, Ms. Manning, Mr. Brown with analysis of alternative language in agreement, rescission issues, enforcement of mediator statement, proposed language	0.90
10/13/2022	ELS Administration, General Work on settlement agreement	0.50
	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Ms. Manning, Mr. Crom with proposed final version of settlement agreement, various revisions thereto, update waterfall with litigation costs, changes in amounts to creditors, final version with declaration	3.20
10/14/2022	ELS Administration, General Work on declaration, settlement agreement	0.80

			<u>Hrs/Rate</u>
10/14/2022	ELS	Administration, General emails to/from Ms. Manning, Mr. Brown, Mr. Meade re revised declaration, redline re further revisions to agreement	0.50
10/16/2022	ELS	Administration, General Work on obtaining signatures settlement agreement	0.30
10/17/2022	ELS	Administration, General email from Ms. Manning re deferred filing	0.10
	ELS	Administration, General emails from/to Mr. Meade re executed agreement, hearing date	0.20
	ELS	Administration, General email from Mr. Meade updated waterfall to counsel for debtor	0.10
10/18/2022	ELS	Administration, General emails from/to Mr. Meade, Ms. Manning re motion for payment of special litigation counsel fees	0.20
	ELS	Administration, General email from Ms. Manning with further revision to declaration	0.10
	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown re form of motion for fees	0.50
10/19/2022	ELS	Administration, General Attention to declaration	0.20
	ELS	Administration, General emails from/to Mr. Kieve, Mr. Crom re estimated taxes	0.30
10/20/2022	ELS	Fee Applications Review of Meade fee application; discussions with counsel re same	0.60
	ELS	Claims Admin Review of claims re Kieve request; discussions with counsel re same	0.30
	ELS	Claims Admin emails from/to Ms. Manning re payments to DSO claimants	0.20
10/21/2022	ELS	Administration, General Conference call with Mr. Brown and Mr. Crom re timing of professional payments, tax implications	0.50
10/24/2022	ELS	Administration, General emails from/to Mr. Meade, Mr. Brown, Mr. Crom re payment of litigation counsel fees, tax implications of timing	0.30

		<u>Hrs/Rate</u>
10/24/2022	ELS Administration, General email to/from Mr. Meade re query Orrick \$100k payment, timing	0.10
10/25/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re proposed order	0.20
10/27/2022	ELS Administration, General emails from/to Mr. Meade, Mr. Brown re Fader objection to settlement	0.20
	ELS Administration, General emails from/to Ms. Manning re Gaddy request for extension of time to object	0.20
10/28/2022	ELS Administration, General emails to/from Mr. Brown, Mr. Meade re response to Fader objection	0.40
	ELS Claims Admin emails from/to Ms. .Manning re response to DSO claimant query	0.10
10/31/2022	ELS Administration, General email from Ms. Manning re Gaddy communication	0.10
11/1/2022	ELS Administration, General Discussions Mr. Brown re potential debtor objections to settlement	0.20
	ELS Administration, General emails from/to Mr. Brown, Ms. Manning, Mr. Kieve, Mr. Meade re Fader objections to settlement	1.60
	ELS Administration, General emails from/to Mr. Brown, Ms. Manning, Mr. Meade re Gaddy objection	0.90
11/2/2022	ELS Administration, General Conference call with counsel, debtor's counsel re prospective objections to settlement	0.40
	ELS Administration, General emails from/to Mr. Brown, Mr. Kieve re Fader objections to settlement	0.90
11/4/2022	ELS Administration, General emails from/to Ms. Manning, Mr. Brown re Gaddy objection	0.50
11/8/2022	ELS Administration, General email from Ms. Manning re Gaddy objection	0.10

		<u>Hrs/Rate</u>
11/9/2022	ELS Administration, General emails from/to Ms. Manning, Mr. Brown, Mr. Meade re Gaddy objection to settlement	0.50
11/10/2022	ELS Administration, General emails from/to Ms. Manning, Mr. Brown, Mr. Meade re language of proposed order	0.70
11/11/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Crom re language in order for tax payments, response to Mr. Kieve	0.40
11/12/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re language in order re contingent fees	0.20
11/14/2022	ELS Administration, General emails from/to Ms. Manning, Mr. Brown, Mr. Meade, Mr. Crom re order on objections, order re tax payment	0.40
11/15/2022	ELS Administration, General Phone con with counsel re form of order	0.40
	ELS Administration, General Conference call with counsel re proposed form of order, hearing	0.30
	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Mr. Nagy re form of order, debtor objections to settlement	0.80
11/16/2022	ELS Administration, General Conference call with counsel re hearing on proposed order	0.30
	ELS Administration, General Attend hearing re form of order	0.20
	ELS Administration, General emails from/to Mr. Crom, Mr. Brown, Mr. Meade re order	0.50
11/17/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Meade, Ms. Manning re payment per settlement, wire transfer instructions	0.40
11/18/2022	ELS Administration, General emails from/to Mr. Brown, Mr. Meade re court's tentative ruling	0.30
11/30/2022	ELS Administration, General email from Mr. Brown with invoices, re interim fees	0.10

		<u>Hrs/Rate</u>
12/1/2022	ELS Administration, General email from Mr. Meade re query appeal period	0.10
12/2/2022	ELS Administration, General emails to/from Mr. Brown, Mr. Meade re appeal period	0.20
12/7/2022	ELS Administration, General emails to/from Mr. Brown re confirmation of wire instructions	0.20
12/11/2022	ELS Fee Applications Work on interim fee application	1.50
12/19/2022	ELS Administration, General Work on wire transfers special litigation counsel partial fees	0.40
12/31/2022	ELS Fee Applications Edit time records, work on interim fee application	3.20
1/1/2023	ELS Fee Applications Work on interim fee application; edit time records	0.50
1/2/2023	ELS Fee Applications Receive, review, approve PSZJ interim fee application	0.30
	ELS Fee Applications Work on interim fee application; review, edit time records	1.50
1/3/2023	ELS Banking reconcile bank statements	0.30
1/6/2023	ELS Fee Applications Work on interim fee applications	4.50
1/7/2023	ELS Fee Applications Work on First Interim Fee Application	2.30
1/8/2023	ELS Claims Admin email exchange wit Ms. Manning re DSO claims	0.20
1/11/2023	ELS Claims Admin email exchange with Mr. Crom, Ms. Manning re DSO claims	0.20
2/2/2023	ELS Tax Review balances for payment of taxes due, advise BCC	0.30
2/3/2023	ELS Fee Applications email exchange with Mr. Brown re fee apps	0.30

			<u>Hrs/Rate</u>
2/7/2023	ELS	Assets Recap email exchange with Ms. Manning, Mr. Crom, Mr. Brown re rescission rights vs rapid distribution	0.60
2/8/2023	ELS	Banking Reconcile bank statements	0.30
3/2/2023	ELS	Banking Reconcile bank statements	0.30
3/5/2023	ELS	Assets Recap Phone con Mr. Brown re fee opinion, response and proposal for counsel	0.20
3/8/2023	ELS	Assets Recap Conference call among counsel to discuss response to court's opinion and suggestion re division of fees among counsel	0.30
3/15/2023	ELS	Assets Recap Work on tracing incoming wire due, second settlement installment	0.30
	ELS	Assets Recap emails from/to Mr. Brown, Axos re receipt of wire transfer	0.50
3/16/2023	ELS	Assets Recap emails exchange with Mr. Crom re anticipated incoming wire	0.20
3/17/2023	ELS	Assets Recap email exchange with Axos re missing incoming wire	0.20
3/20/2023	ELS	Assets Recap email exchanges with bank re tracing incoming wire	0.90
3/23/2023	ELS	Tax email exchange with Mr. Crom re tax payments	0.10
3/25/2023	ELS	Fee Applications email exchange with Mr. Brown re fee issues	0.10
4/3/2023	ELS	Banking Reconcile bank statements	0.30
4/4/2023	ELS	Claims Admin email exchange with UST re approval for outgoing wire	0.10
	ELS	Fee Applications email exchange with Mr. Brown re fee issues	0.20
4/5/2023	ELS	Fee Applications email exchange with Mr. Brown, Mr. Meade re fees	0.10

			<u>Hrs/Rate</u>
4/6/2023	ELS	Fee Applications email exchange with Mr. Brown, Mr. Meade re fee allocation	0.50
4/7/2023	ELS	Fee Applications Work on computation, payment of final contingency fees due special litigation counsel	0.80
	ELS	Fee Applications email exchange with Mr. Brown, Mr. Meade re payment of fees, wire instructions	0.30
4/10/2023	ELS	Fee Applications Work on reallocation of fees between Pachulski and Meade Firm; process discounted wire for Meade; issue equalizing check for Pachulski	0.40
	ELS	Claims Admin email to Axos re wire transfer out	0.10
4/11/2023	ELS	Fee Applications email exchange with Mr. Meade re wire	0.10
4/20/2023	ELS	Claims Admin email exchange with Mr. Kieve re Abbott claim	0.10
4/21/2023	ELS	Claims Admin email exchange with Mr. Brown re Abbott claim	0.20
4/30/2023	ELS	Claims Admin email exchange with Mr. Kieve re Abbott claim	0.10
5/5/2023	ELS	Banking Reconcile bank statements	0.30
5/12/2023	ELS	Claims Admin email exchange with Mr. Brown, Mr. Kieve, Ms. Manning re objection to Abbott claim	0.40
5/15/2023	ELS	Claims Admin email exchange with Mr. Brown re Abbott claim	0.10
5/17/2023	ELS	Claims Admin email exchange with Ms. Manning re draft objection to Abbott claim	0.20
5/18/2023	ELS	Claims Admin Work on prospective final distribution	0.40
	ELS	Claims Admin email exchange with Mr. Brown, Ms. Manning, Mr. Kieve re response to Abbott claim	0.40

		<u>Hrs/Rate</u>
5/18/2023	ELS Assets Recap email exchange with Mr. Brown, Ms. Manning re 91 day rescission deadline	0.70
5/19/2023	ELS Assets Recap email exchange with Mr. Crom, Ms. Manning, Mr. Brown re 91 day rescission deadline	0.30
5/26/2023	ELS Claims Admin email exchange with Ms. Manning re Abbott reply	0.10
5/31/2023	ELS Claims Admin email exchange with Mr. Brown re payment to debtor	0.20
6/1/2023	ELS Claims Admin Work on claims and final distribution projections; review Fader query re payment timing; refer objectionable claims to counsel	2.80
	ELS Claims Admin email exchanges with Mr. Brown, Mr. Crom re claims: payments, distribution timeline	0.60
	ELS Assets Recap email exchange with Mr. Brown, Ms. Manning re 91 day rescission deadline	0.30
6/2/2023	ELS Claims Admin email exchange with Mr. Kieve re timeline for payment to the debtor	0.10
	ELS Assets Recap email exchange with Mr. Brown, Ms. Manning re 91 day rescission deadline	0.10
	ELS Banking Reconcile bank statements	0.30
6/3/2023	ELS Claims Admin Work on possible interim distribution to debtor	0.50
	ELS Claims Admin email exchanges with Mr. Kieve, Mr. Brown, Mr. Crom re expedite Fader payment	0.80
6/4/2023	ELS Claims Admin email exchanges with Mr. Kieve, Ms. Manning, Mr. Crom, Mr. Brown re expediting Fader payment, taxes payable	0.60
6/5/2023	ELS Claims Admin email exchange with Ms. Manning, Mr. Kieve re Fader payment	0.60

			<u>Hrs/Rate</u>
6/6/2023	ELS	Claims Admin email exchange with Ms. Manning, Mr. Brown re loan claims	0.10
6/7/2023	ELS	Claims Admin email exchange with Mr. Brown, Ms. Manning re loan, Gaddy claims	0.20
6/8/2023	ELS	Claims Admin Work on claims review	0.50
	ELS	Claims Admin email exchange with Ms. Manning re loan claims	0.20
6/12/2023	ELS	Claims Admin email exchange with Ms. Manning, Mr. Brown re Abbott writ of attachment	0.30
6/13/2023	ELS	Claims Admin email exchange with Ms. Manning, Mr. Brown re Abbott writ of attachment	0.10
6/14/2023	ELS	Claims Admin email exchanges with Mr. Kieve, Mr. Brown, Ms. Manning re Abbott writ of attachment to Fader distribution	0.70
6/15/2023	ELS	Claims Admin email exchange with Mr. Kieve re Abbott writ	0.20
6/18/2023	ELS	Tax Receive, review, approve and execute tax returns; authorize payments	0.30
6/19/2023	ELS	Tax Process 2022 tax returns, issue payments; review, execute tax returns	0.80
	ELS	Claims Admin Review of payments to be made on 90-day mark; issue instructions re payment of DSO claims plus partial distribution to debtor	0.40
	ELS	Assets Recap email exchange with Mr. Brown, Ms. Manning re Boal representations	0.40
6/20/2023	ELS	Claims Admin Issue DSO and Fader payments	0.40
	ELS	Claims Admin email exchange with Mr. Kieve re Abbott writ	0.20

			<u>Hrs/Rate</u>
6/20/2023	ELS	Assets Recap email exchange with Mr. Brown, Ms. Manning re Boal/Quotient settlement, dismissal	0.40
6/21/2023	ELS	Claims Admin Work on distributions to DSO and debtor	0.40
	ELS	Claims Admin Issue DSO and Debtor partial payment	0.40
	ELS	Assets Recap email exchange with Ms. Manning, Mr. Brown re Boal settlement	0.20
	ELS	Claims Admin email exchange with Mr. Kieve re Abbott writ	0.10
6/26/2023	ELS	Claims Admin email exchanges with Mr. Crom, Ms. Marshall re payroll tax liability	0.60
6/28/2023	ELS	Claims Admin email exchange with Ms. Manning re Gaddy claim	0.10
7/5/2023	ELS	Banking Reconcile bank statements	0.30
7/10/2023	ELS	Claims Admin email exchange with Mr. Brown re claims objections	0.10
7/11/2023	ELS	Claims Admin email exchanges with Ms. Manning, Mr. Brown re claims review and analysis	0.70
7/12/2023	ELS	Claims Admin email exchange with Ms. Manning, Mr. Brown re claims review and analysis	0.40
7/13/2023	ELS	Claims Admin Conference call with counsel re claims review and objections	1.10
	ELS	Claims Admin email exchange with Ms. Manning re claims review and analysis	0.30
7/21/2023	ELS	Claims Admin email exchange with Mr. Crom re waterfall and taxes	0.10
7/24/2023	ELS	Claims Admin email exchanges with Mr. Crom, Mr. Brown re accounting issues, issues with computing taxes due on wage claims	0.60

			<u>Hrs/Rate</u>
7/25/2023	ELS	Fee Applications email exchange with Mr. Brown re counsel fees	0.10
	ELS	Fee Applications email exchange with Mr. Brown with current invoice	0.10
7/26/2023	ELS	Claims Admin email exchange with Mr. Brown, Mr. Crom re timing of final tax returns	0.20
	ELS	Claims Admin email exchange with Ms. Manning re objection to Gaddy claim	0.10
7/27/2023	ELS	Claims Admin email exchange with Mr. Brown, Mr. Crom re estimated final fees and taxes	0.30
8/7/2023	ELS	Claims Admin email exchange with Mr. Kieve re Fader distribution	0.10
8/11/2023	ELS	Claims Admin email exchange with Ms. Manning re objection to Gaddy claim	0.10
8/12/2023	ELS	Banking Reconcile bank statements	0.30
8/14/2023	ELS	Claims Admin email exchange with Ms. Manning re draft objection to claim #5	0.10
8/15/2023	ELS	Claims Admin email exchange with Mr. Kieve re Fader distribution	0.30
8/18/2023	ELS	Claims Admin email exchange with Ms. Manning re status claims objections	0.10
8/24/2023	ELS	Claims Admin email exchange with Ms. Manning re remaining claims	0.10
8/28/2023	ELS	Claims Admin email exchange with Mr. Crom re Gabby objection	0.10
	ELS	Claims Admin email exchange with Ms. Manning re objection to Dean claim	0.30
8/29/2023	ELS	Claims Admin email exchange with Mr. Brown, Mr. Crom re estimated future fees and tax computations	0.40
	ELS	Claims Admin email exchange Ms. Manning re objection to Lewis and Dean claims	0.20

		<u>Hrs/Rate</u>
9/5/2023	ELS Claims Admin email exchange with Ms. Manning re claims 11, 12 and 14	0.10
9/7/2023	ELS Claims Admin email exchange with Ms. Manning re Dean affirmation	0.30
9/8/2023	ELS Banking Reconcile bank statements	0.30
9/11/2023	ELS Claims Admin email exchange with Ms. Marshall re claims 11, 12 and 14	0.20
9/12/2023	ELS Claims Admin email exchange with Mr. Sweet re Dean creditor claim and objection	0.30
9/13/2023	ELS Claims Admin email exchange with Ms Law re wage query	0.10
	ELS Claims Admin email exchange with Ms. Manning re Dean claim, waterfall	0.50
9/15/2023	ELS Claims Admin email exchange with Ms. Law re wage query	0.10
	ELS Claims Admin email exchange with Ms. Manning re waterfall	0.20
9/21/2023	ELS Claims Admin email from BCC with tax return	0.10
9/24/2023	ELS Claims Admin email exchange with Ms. Manning re claims 9, 12, 14 and 18	0.10
9/25/2023	ELS Claims Admin Phone con Mr. Brown re order for payment of 2023 tax liability; review, execute 2023 taxes	0.40
	ELS Claims Admin email exchange with Mr. Crom, Mr. Brown re order on tax payments	0.20
	ELS Claims Admin email exchange with Mr. Brown re order for payment of tax claims	0.20
9/26/2023	ELS Claims Admin email exchange with Ms. Manning re claims 9, 12, 14 and 18	0.40
10/3/2023	ELS Claims Admin Process tax payments 2023 IRS & FTB	0.40

		<u>Hrs/Rate</u>
10/3/2023	ELS Claims Admin email exchange with Mr. Brown re timing of distributions	0.10
10/8/2023	ELS Banking Reconcile bank statements	0.30
10/10/2023	ELS Claims Admin email exchange with Ms. Manning re objection to Lewis claim	0.30
10/12/2023	ELS Claims Admin email exchange with Ms. Manning re objection to Lee and Lewis claims	0.20
10/16/2023	ELS Claims Admin email exchange with Ms. Manning re objection to Lee claim	0.10
10/17/2023	ELS Claims Admin email exchange with Ms. Manning re objection to Lee claim	0.10
10/25/2023	ELS Claims Admin email exchange with Ms. Manning re order on Gaddy claim, objection to Lee claim	0.30
10/26/2023	ELS Claims Admin email exchange with Mr. Crom re Form 2 needed for tax return preparation	0.10
	ELS Claims Admin email exchange with Mr. Crom, Mr. Brown re order on objection to Gaddy claim	0.40
10/27/2023	ELS Claims Admin email exchange with Mr. Crom re order on objection to Lee claim	0.10
11/5/2023	ELS Claims Admin email exchange with Ms. Manning re Watt claim	0.10
11/6/2023	ELS Claims Admin email exchange with Ms. Manning re Watt claim	0.10
	ELS Banking Reconcile bank statements	0.30
11/7/2023	ELS Claims Admin email exchange with Ms. Manning re Watt claim	0.20
11/8/2023	ELS Claims Admin email exchange with Ms. Manning, Mr. Brown re order on Lee claim	0.20

		<u>Hrs/Rate</u>
11/17/2023	ELS Claims Admin email exchange with Ms. Manning re order on Lewis claim	0.10
12/5/2023	ELS Banking Reconcile bank statements	0.30
12/6/2023	ELS Assets Recap email exchange with Mr. Crom, Ms. Marshall re closing status	0.20
12/12/2023	ELS Claims Admin Work on claims review, finalize proposed distribution to incorporate final allowed claims	1.70
	ELS Claims Admin Work on revisions to wage claims; revise proposed distribution	0.30
	ELS Claims Admin email exchanges with Mr. Crom, Ms. Manning re proposed distribution	0.50
12/13/2023	ELS Claims Admin Work on claims waterfall; adjust for priority wage claims; build in BCC fees	0.40
	ELS Claims Admin email exchanges with Ms. Manning, Mr. Crom re fees, final distribution	0.80
1/3/2024	ELS Claims Admin email exchange with Ms. Law re wage claim analysis	0.10
1/4/2024	ELS Claims Admin email exchange with Ms. Law re missing final fees	0.20
	ELS Fee Applications email exchange with Ms. Manning re final fee app	0.10
1/10/2024	ELS Claims Admin email exchange with Mr. Crom, Ms. Law re proposed distribution, tax bill	0.30
	ELS Claims Admin email exchange with Mr. Brown, Ms. Manning re distribution status, updates	0.60
	ELS Banking Reconcile bank statements	0.30

			<u>Hrs/Rate</u>
1/11/2024	ELS	Claims Admin email exchange wiht Ms. Manning, Mr. Crom re tax liabilities, wage claims	0.50
	ELS	Claims Admin email exchange with Ms. Manning re distribution status, update	0.20
1/12/2024	ELS	Claims Admin email exchange with Mr. Crom re Dennen claim	0.10
1/16/2024	ELS	Fee Applications Receive, review, approve counsel's final fee application	0.30
	ELS	Fee Applications email exchange with Ms. Manning re final fee application	0.30
1/17/2024	ELS	Fee Applications email exchange with Ms. Manning re final fee application	0.10
1/19/2024	ELS	Fee Applications Phone con Mr. Crom re final calculations professional fees; payroll tax withholding for wage claims	0.30
1/21/2024	ELS	Banking email to Axos re turn off bank fees	0.10
1/23/2024	ELS	Claims Admin email exchange wih Ms. Law, Mr. Crom re distribution waterfall, wage taxes	0.50
1/24/2024	ELS	Claims Admin Work on wage claims, withholding	3.50
1/25/2024	ELS	Claims Admin Work on wage claims, withholding	0.80
	ELS	Claims Admin email exchanges with Ms. Law, Mr. Crom, Axos bank re payroll taxes	1.00
1/26/2024	ELS	Claims Admin email exchanges with Ms. Law, Mr. Crom, Axos re wage claim payroll tax computation	0.90
1/27/2024	ELS	Fee Applications Review, approve accountant final fee application	0.20
	ELS	Claims Admin email exchanges with Ms. Manning, Mr. Brown re late filed claim	0.40

			<u>Hrs/Rate</u>
1/28/2024	ELS	Claims Admin email exchange with Ms. Manning re late filed claim,	0.20
1/29/2024	ELS	Claims Admin email exchanges with Mr. Crom, Axos re status of wage claim analysis, computation	0.50
	ELS	Fee Applications email exchange with Ms. Manning re final fee application	0.10
1/30/2024	ELS	Claims Admin email exchanges with Axos re status of wage claim analysis, computation	1.00
1/31/2024	ELS	Fee Applications Work on final report, claims reconciliation, tax withholding and reporting	0.80
	ELS	Claims Admin email exchanges with Axos and Mr. Crom re status of wage claim analysis, computation of tax liabilities	1.50
2/1/2024	ELS	Claims Admin email exchanges with Axos re status of wage claim analysis and computation of tax liabilities	0.70
2/2/2024	ELS	Claims Admin email exchange with Mr. Crom, Mr. Brown re debtor request for advance of partial distribution	0.40
	ELS	Claims Admin email exchange with Mr. Kieve re Fader distribution	0.10
2/5/2024	ELS	Claims Admin email exchange with Mr. Kieve re Fader distribution	0.30
	ELS	Banking Reconcile bank statements	0.30
2/17/2024	ELS	Fee Applications Work on final fee app, edit time records	0.50
2/18/2024	ELS	Fee Applications Work on fee application, edit time records	1.70
			<hr/> 197.60